

Tab 10 to Appendix of Exhibits to Motion of Defendant Brush Wellman, Inc. for Summary Judgment:

CHESMAR AFFIDAVIT

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Suzanne Genereux, et al.,

Plaintiff,

v.

American Beryllia Corp, et al.

Defendant.

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) Case No. 04-CV-12137 JLT
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AFFIDAVIT OF GREG CHESMAR


Greg Chesmar, being first duly sworn, states as follows:

1. I am a former employee of Brush Wellman Inc. ("Brush"). During the period 1980 to 1987, as a Senior Sales Engineer, I was responsible for sales to The Raytheon Corporation in Waltham, MA. I made Brush's sales calls to Raytheon during those years, and recall the products that Brush sold to Raytheon. I have also reviewed records of those sales.


2. Raytheon purchased certain finished beryllium oxide parts from Brush, mostly in the form of rods or tubes. I understand that the plaintiff in this case has testified that she worked with round beryllium oxide "windows" that were approximately 3 inches in diameter. Raytheon did not purchase beryllium oxide parts of that size and shape from Brush.

3. I never saw any sandblasting or gritblasting operations at Raytheon's Waltham facility. In fact, I did not observe any handling of beryllium oxide parts at this facility. My sales calls took place in offices, not on the manufacturing floor. I am not aware of any other Brush employee having observed how Raytheon handled beryllium oxide at this facility.

4. The Raytheon employees with whom I had contact were all aware of the potential toxicity of beryllium oxide, and I understood that Raytheon was being careful to reduce the risk of exposure to beryllium oxide in this facility, but I did not learn or see exactly what Raytheon was doing in this regard, except for a Raytheon Process Specification for cleaning beryllium oxide parts delivered by vendors.


Greg Chesmar

Sworn to and subscribed before me
this 9th day of October, 2006.


Notary Public

